

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

BONGO PRODUCTIONS, LLC, ROBERT )  
BERNSTEIN, SANCTUARY PERFORMING )  
ARTS LLC, and KYE SAYERS, )

Plaintiffs, )

v. )

CARTER LAWRENCE, Tennessee State Fire )  
Marshal, in his official capacity, )  
CHRISTOPHER BAINBRIDGE, Director of )  
Codes Enforcement, in his official capacity, )  
GLENN R. FUNK, District Attorney General )  
for the 20th Judicial District, in his official )  
capacity, and NEAL PINKSTON, District )  
Attorney General for 11th Judicial District, in )  
his official capacity, )

Defendants. )

Civ. Action  
No. 3:21-cv-00490  
Judge Trauger

**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Rule 83.01(b) of the Local Rules of this Court, Thomas H. Castelli, a member of the bar of this Court, hereby moves for the admission *pro hac vice* of Rose Saxe, an attorney at the American Civil Liberties Union, 125 Broad Street, 18th Floor, New York, NY 10004, 212-549-2605, rsaxe@aclu.org, for the purposes of this litigation in this Court as counsel for plaintiffs.

1. Rose Saxe does not reside in this district and does not maintain an office in this district for the practice of law.

2. Rose Saxe is a member in good standing of the United States District Court for the Southern District of New York. A certificate of good standing and sworn statement

regarding disciplinary, contempt, and criminal proceedings are attached, and the filing fee in the amount of \$100.00 has been paid to the Clerk via the Court's electronic payment system.

Respectfully submitted,

/s/ Thomas H. Castelli

Thomas H. Castelli, BPR No. 024849

Stella Yarbrough, BPR No. 33637

ACLU Foundation of Tennessee

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Nashville, TN 37212

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**DECLARATION OF ROSE SAXE**

1. I hereby certify that I am a member in good standing of the of the United States District Court for the Southern District of New York. A true and correct copy of my Certificate of Good Standing is included with the motion for my admission *pro hac vice*.
2. I also declare under penalty of perjury that I am not, nor have I ever been, the subject of criminal proceedings nor disciplinary proceedings by any disciplinary authority, nor have I had a finding of contempt or a sanction against me under 28 U.S.C. § 1927.

/s/ Rose Saxe  
Rose Saxe  
American Civil Liberties Union  
125 Broad Street, 18<sup>th</sup> Floor  
New York, NY 10004  
(212) 549-2605  
rsaxe@aclu.org

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on June 25, 2021, a true and correct copy of the foregoing has been served by e-mail according to the agreement and instructions from the Attorney General's Office to tnattygen@ag.tn.gov.

/s/ Thomas H. Castelli

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*Attorney for Plaintiffs*